



303018

Keith Wilcoxson

From: Moyer, Scott R UTCHQ [Scott.Moyer@utc.com]
Sent: Friday, March 07, 2008 11:17 AM
To: Kolak.Shari@epamail.epa.gov
Subject: RE: meeting with RCRA
Importance: High

Hi Shari

Here's a short list of HSC RCRA concerns moving forward:

- From a pure program issue, we need something from the USEPA and IEPA to affirm that this RA action will relieve Hamilton Sundstrand from future RCRA actions for those SWMUs and AOC's identified in the ROD.
- We need an understanding from both agencies if additional SWMUs or AOC's are identified outside the ROD (and are impacting the GW), that they will be addressed by this action. What is the process?
- For SWMU's that are not impacting GW and can be closed, we would want both agencies to accept the USEPA decision (assuming they have now retained authority from IEPA). What is the process?
- We would want the agencies to demonstrate there will not be duplicative efforts by review, or document submittals for differing programs for the same SWMU or AOC.
- We need to understand how the current RCRA financial assurance issue on the Part A permit (OSA) with IEPA/USEPA will be handled. We could essentially be providing two to three financial assurances for the same unit(s). (CERCLA action, IEPA RCRA, USEPA RCRA). Our preference is one for the CERCLA action, with all others to be vacated by the agencies (in writing).
- If a post closure issue arises for a CERCLA ROD SWMU vs. Non-CERCLA ROD SWMU, how will it be handled? Process? Again, we would prefer one process.
- HSC will need to receive a copy of the inter-agency agreement regarding RCRA authority for Hamilton Sundstrand's Plant 1 facility. If none exists, one should be developed to solidify the governments RCRA roles on this project.
- Our consultant will need to generate documents for submittal, hopefully not duplicative for separate programs. Process?

If we come up with any more, we will throw them your way. Thank you for your assistance in addressing these matters.

Please call if you have any questions.

Best regards,

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3/13/2008

Table 1
RCRA SWMUs/AOCs
Hamilton Sundstrand Plant 1 / Former Plant 2 Facilities
Rockford, Illinois
CERCLIS ID #981000417

SWMU or AOC # (with associated Document)	SWMU Name/Description
SWMU 1 (RFA)	Wastewater Treatment Plant (WWTP)
SWMU 2 (RFA)	Scrubber (Roof)
SWMU 3 (RFA)	Tank Farm (North)
SWMU 4 (RFA)	Tank Farm (South)
SWMU 5 (RFA)	Underground Tank #1
SWMU 6 (RFA)	Underground Tank #2
SWMU 7 (RFA)	Underground Tank E
SWMU 8 (RFA)	Underground Tank #32
SWMU 9 (RFA)	Plant #2 Drum Storage Area (OSA)
SWMU 10 (RFA)	Plant #1 Indoor Drum Storage Area
SWMU 11 (RFA)	Impacted Soil Drum Storage Area
SWMU 12 (RFA)	Aboveground Indoor Storage Tank
SWMU 13 (RFA)	Onsite Area 9/10 Conditions
SWMU 14 (RFA)	Waste Oil Drum
AOC 25 (CP)	Drum Wash Area
AOC 26 (CP)	Old Dichromate Line
AOC 27 (CP)	Plant 1 Old Plating Area
AOC 28 (CP)	Plant 1 Sodium Dichromate Line
AOC (no #, CP)	Acid Drum Storage Area
AOC (no #)	2000 LUST Incident

Fuel closure

Notes:

SWMU = Solid Waste Management Unit

AOC = Area of Concern

RFA = RCRA Facility Assessment - 7-27-92

CP = Closure Plan, Plant 1 Container Storage Area - 11-19-92

OSA = Outside Container Storage Area

Blue highlight = SWMUs/AOCs proposed for inclusion in the SE Rockford Groundwater Contamination Superfund Site Remedial Action Consent Decree/Statement of Work (CD/SOW) based on their historic use and current physical conditions

Other SWMUs/AOCs to be visually inspected; their conditions will be documented using the Illinois EPA approved form in a request for closure; if closure cannot be granted for certain SWMUs/AOCs, it may be requested they be incorporated for remaining closure activities into the Remedial Action at a later date.